

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, DOUGLAS MORRILL,
ROSEANNE MORRILL, LEISA GARRETT,
ROBERT NIXON, SAMANTHA NIXON,
DAVID BOTTONFIELD, ROSEMARIE
BOTTONFIELD, TASHA RYAN, ROGELIO
VARGAS, MARILYN DEWEY, PETER
ROLLINS, RACHAEL ROLLINS,
KATRINA BENNY, SARA ERICKSON,
GREG LARSON, and JAMES KING,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;
HAPPY HOUR MEDIA GROUP, LLC, a
Washington limited liability company; THE
LAMPO GROUP, LLC, a Tennessee limited
liability company,

Defendants.

Case No. 2:23-cv-00630

**DECLARATION OF GREGORY W.
ALBERT IN SUPPORT OF
PLAINTIFFS' MOTION TO AMEND
THE COMPLAINT**

1 My name is Gregory W. Albert. My Washington State Bar Association Number is
2 42573. I am over the age of eighteen years and make this declaration under penalty of perjury.

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4 1. Attached to this declaration as Exhibit 1 is an interlineated copy of Plaintiffs' proposed
5 Amended Complaint.

6 DATED this 26th day of October, 2023.

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9 By: s/Gregory W. Albert

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